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May 10, 2005

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

**Re: *Ex Parte* Filing
IP-Enabled Services, WC Docket No. 04-36**

Dear Ms. Dortch:

We are providing the Commission with the following letter to keep the Commission apprised of Vonage's conversations with BellSouth concerning the delivery of VoIP E-911 services. Should you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

/s/
William B. Wilhelm, Jr.

Counsel for Vonage Holdings Corp.

cc: Chairman Kevin J. Martin
Commissioner Kathleen Abernathy
Commissioner Jonathan Adelstein
Commissioner Michael Copps
Julie Veach

May 9, 2005

VIA OVERNIGHT MAIL

Mr. William Smith
Chief Technology Officer
BellSouth
675 W. Peachtree Street N.E.
Suite 4515
Atlanta, GA 30375

Dear Mr. Smith:

I write to respond to your May 5, 2005, letter regarding Vonage's request to obtain E-911 capabilities. We also believe that a technological solution can be rapidly achieved and look forward to working with BellSouth over the next two weeks. In fact, we are in the process of scheduling a technical call that will occur either today or tomorrow. You are correct that we are very interested in obtaining direct connections to the sixty-four 911 selective routers so as to enable Vonage to deliver calls to the Public Safety Answering Points ("PSAPs"). I would also like to clarify the other elements that Vonage will need access to in order to deliver a robust E-911 service to our customers. As you are well aware, VoIP services present unique emergency call delivery issues. Vonage's customers leverage the power of the Internet to utilize the service from fixed and nomadic locations. Accordingly, Vonage needs access to elements of both the wireline and wireless emergency services network.

In developing VoIP E-911 solutions with Qwest and Verizon, both RBOCs have made available ESQK (pseudo ANI) assignment or acquisition, ESQK provisioning service, real time ALI update access and transport for voice (to the selective router) and data (to the ALI servers). Where available, Vonage will also obtain full use of the ESGW (shared gateway to all selective routers) structure to help facilitate transport. There may be other services locally required, which are part of the standard wireline or wireless service configuration.

It is only through access to these elements of the emergency services network that Vonage and BellSouth can provide a holistic solution to VoIP customers that will ensure that no consumer is left outside of the E-911 umbrella. Additionally, it would be unacceptable, from a public policy perspective, for consumers to have severe qualitative differences as to the type of VoIP emergency services that are available based on which RBOC service area they happen to find themselves in due to the portable nature



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of the service. For these reasons, I write to seek your clarification that BellSouth will make available all elements necessary to allow Vonage and BellSouth to implement a solution that will allow for extending the benefits of E-911 to nomadic VoIP consumers and allow Vonage to purchase the necessary elements directly from BellSouth. As detailed herein, such a solution would be comparable to that being tested and deployed in areas served by Qwest and Verizon.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeffrey A. Citron', written over a printed name.

Jeffrey A. Citron

cc: Kevin J. Martin, Chairman FCC
Kathleen Abernathy, FCC Commissioner
Michael J. Copps, FCC Commissioner
Jonathan S. Adelstein, FCC Commissioner
Gregory S. Ballentine, President APCO International
Charles M. Davidson, Commissioner, Florida Public Service Commission
Honorable Jeb Bush
Stan Wise, Commissioner, Georgia Public Service Commission
Deborah Taylor Tate, Director, Tennessee Regulatory Authority
Troy King, Attorney General Alabama
Honorable Charles "Chip" Pickering, Jr.
Honorable Cliff Stearns
Duane Ackerman, Chairman & CEO, BellSouth Corporation